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Application granted. The discovery conference will take place in person on June 7, 2024, at 1:00 PM.

May 29, 2024

VIA ECF

The Honorable Arun Subramanian, U.S.D.J.
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 15A
New York, New York 10007

The Clerk of Court is directed to terminate the motion at Dkt. 98.

SO ORDERED.

A handwritten signature in blue ink, appearing to read 'Arun Subramanian'.

Arun Subramanian, U.S.D.J.

Date: May 29, 2024

**Re: AiDigital Operating LLC v. Kyle Kuchera et al., Docket No. 23-cv-11076
Adjournment Request – May 31, 2024 Discovery Conference**

Dear Judge Subramanian:

This law firm represents Plaintiff AiDigital Operating LLC (“AiDigital”) in the above-referenced matter. Pursuant to Your Honor’s Individual Practice 3(E), we write with the consent of Defendants and Counterclaim Defendant to request an adjournment of the discovery conference currently scheduled for May 31, 2024. Counsel for all parties are available on Thursday, June 6, 2024 and if the Court is available, we respectfully request the conference be adjourned to that date. If the Court is not available on June 6, we request that the parties be permitted to confer about alternative dates on which the Court is available.

I am unavailable on May 31 due to an immovable conflict and understand that as Lead Trial Counsel for AiDigital, I must be personally present at the conference. In addition, my colleague, Rasmeet Chahil, who has been heavily involved in the discovery disputes, will be travelling out of state on May 31. Ms. Chahil’s presence is critical given the highly detailed and technical matters that the discovery conference will likely cover. Moreover, the parties are also discussing a resolution of part of the case, which may obviate all or some of the discovery disputes. The parties are working diligently and will likely know by week’s end whether such a resolution is achievable.

There have been no previous requests for an adjournment of this conference. The adjournment will not affect any of the other deadlines in the case, as the parties continue to move forward expeditiously with discovery as Your Honor instructed at the last conference.

We thank the Court in advance for its attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Michael A. Kaplan'.

Michael A. Kaplan

cc: All counsel of record via ECF